

To: The Federal Communication Commission  
From: Robert P. Haviland, W4MB  
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I have been a holder of an Amateur license since 1931, and currently hold Amateur Extra Class. I have participated in emergency communications, "DX-Peditions", and participated in several of the International conferences of the ITU and the previous CCIR, at times working on Amateur matters.

One of the major values of the Amateur Service is communications in emergencies. The Service is uniquely suited to this activity, because its members are wide-spread, technically competent, and accustomed to communication under adverse conditions. Many Amateurs maintain an "emergency kit" just for this purpose.

Modern "high-tech" communications systems are wonderful until the power fails, until time exhausts batteries, until equipment is damaged by water, falling debris, even submerged in water and inundated by mud: just the conditions existing in severe emergencies. At this time the simplest equipment has the best chance of being useful. Almost always this means a CW transmitter and the simplest possible receiver. At the extreme it can mean the salvage from a broadcast band receiver, converted by some ingenuity, and keyed by touching two wires together.

CW is an absolute necessity under extreme emergency conditions.

For this reason I totally oppose elimination or reduction of proof of proficiency in CW from Amateur licensing. I am of the opinion that the ITU erred in making CW optional, and that other administrations err in eliminating the requirement.

I further suggest that any person or group filing a petition to remove the CW requirement be asked to file also their experience in emergency conditions.

Respectfully Submitted.

/s/ R. P. Haviland